

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**REORGANIZED DEBTORS' WITNESS AND EXHIBIT LIST FOR
HEARING ON MARCH 6, 2019**

The above-captioned reorganized debtors (collectively, the “Reorganized Debtors”) file their
Witness and Exhibit List for the hearing to be held on March 6, 2019, at 10:00 a.m., Central Time
(or as such hearing may be continued, the “Hearing”).

EXHIBITS

The Reorganized Debtors may offer into evidence any of the following exhibits at the Hearing:

Ex. #	Description	Offered	Objection	Admitted / Not Admitted	Disposition
1.	<p><i>Reorganized Debtors' Twentieth Omnibus Objection to Certain Claims (Assumed Contract Claims, Contingent D&O Indemnity Claims, Late-Filed Claims, Satisfied Claims, No Liability Tax Claims, and Resolved Claims)</i></p> <p>[Docket No. 2000] (and the Proofs of Claim listed and hyperlinked therein).</p>				
2.	<p><i>Declaration of John D. Baumgartner in Support of Reorganized Debtors' Twentieth Omnibus Objection to Certain Claims (Assumed Contract Claims, Contingent D&O Indemnity Claims, Late-Filed Claims,</i></p>				

	<i>Satisfied Claims, No Liability Tax Claims, and Resolved Claims).</i>				
3.	<i>Declaration of John C. Monroe in Support of Reorganized Debtors' Twentieth Omnibus Objection to Certain Claims (Assumed Contract Claims, Contingent D&O Indemnity Claims, Late-Filed Claims, Satisfied Claims, No Liability Tax Claims, and Resolved Claims).</i>				

WITNESSES

The Reorganized Debtors may call any of the following witnesses at the hearing to testify, whether by declaration, in person, or by proffer. The Reorganized Debtors reserve the right to call rebuttal witnesses as necessary. The Reorganized Debtors also reserve the right to cross-examine any witness called by any other party.

1. Declaration of John D. Baumgartner, CIRA, CDBV
Managing Director, Dispute Consulting
Stout Risius Ross, LLC
2. Declaration of John C. Monroe
Tax Compliance Manager
Vanguard Natural Resources, Inc.

Dated: March 4, 2019

BLANK ROME LLP

/s/ James T. Grogan

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Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 4, 2019, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Additionally, I have caused Prime Clerk, LLC, the Reorganized Debtors' Claims and Noticing Agent, to serve the foregoing document on the (i) master service list and (ii) all claimants, or their counsel, affected by the claims objections identified in the agenda.

/s/ Matthew E. Kaslow
Matthew E. Kaslow
